

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

RYSTA LEONA SUSMAN, Both
individually and as a Legal Guardian of
Shane Allen Loveland; and JACOB
SUMMERS,

Plaintiffs,

v.

THE GOODYEAR TIRE & RUBBER
COMPANY,

Defendant.

PLAINTIFFS SECOND AMENDED EXHIBIT
LIST SUBJECT TO OFFER

Court File Number: 8:18CV127

PLF	DF	DESCRIPTION	OFF	OBJ ¹	RC VD	NOT RCVD	DATE
1.		Nebraska State Patrol Select Photos of Accident Scene			X		
2.		Photos of Shane Loveland in Hospital		R. FRCP 26(a), (e); 37(b), (c). FRE 403.			
3.		Video of Shane in the Hospital		R. FRCP 26(a), (e); 37(b), (c). FRE 403.			

¹ **OBJECTIONS**

R: Relevancy

H: Hearsay

A: Authenticity

O: Other (specify)

F: Foundation

FRE: Federal Rule of Evidence

FRCP: Federal Rule of Civil Procedure

MIL: Goodyear's Motion in Limine

MIL No. 161: Re post-manufacture design changes to Subject Tire

MIL No. 164: Re Dr. Lichtblau opinion on medical treatment Mr. Loveland will likely not need in the future

MIL No. 165: Re other tires, models, or designs

MIL No. 168: Re plant practices at Goodyear's Gadsden, Alabama facility

MIL No. 170: Re redaction of confidentiality legends prior to publishing to jury

MIL No. 171: Re investigation into "tread throws" involving Load Range E tires

MIL No. 172: Re other accidents, claims, or lawsuits

MIL No. 173: Re private recall

MIL No. 174: Re National Highway Traffic Safety Administration's Preliminary Evaluation of Load Range E tires and Goodyear's Voluntary Replacement Program

MIL No. 175: Re Bridgestone/Firestone recall and incidents

MIL No. 176: Re adjustment data

MIL No. 178: Re "Day in the Life Video of Shane Loveland"

MIL No. 179: Re sealing trade secret material or commercially sensitive documents

4.		Photos of Shane at Home in Hildreth, NE		R. FRCP 26(a), (e); 37(b), (c). FRE 403.			
5.		Photos of Shane in Physical Therapy		R. FRCP 26(a), (e); 37(b), (c). FRE 403.			
6.		Photos of Shane with the Kids Before the Accident		R. FRCP 26(a), (e); 37(b), (c). FRE 403.			
7.		Photos of Shane with his family Before the Accident		R. FRCP 26(a), (e); 37(b), (c). FRE 403.			
8.		Day in the Life Video of Shane Loveland		MIL (ECF No. 178). R. FRE 403. H.			
9.		Shane Loveland's Employment File from Dandee Construction			X		
10.		CD-ROMs of Imaging Studies from Good Samaritan Hospital			X		
11.		CD-ROM of Imaging Studies from Advanced Medical Imaging		FRCP 26(a), (e); 37(b), (c).			
12.		CD-ROM of Imaging Studies from Swedish Medical Center			X		
13.		Summary of Injuries of Shane Loveland (Demonstrative)		Demonstratives to be exchanged wk of 3/9/20			
14.		Diagnostic Exhibits of Shane Loveland (Demonstrative)		Demonstratives to be exchanged wk of 3/9/20			
15.		Surgical Procedure of Right Ventriculostomy of Shane Loveland (Demonstrative)		Demonstratives to be exchanged wk of 3/9/20			
16.		Surgical Procedure of Insertion of Thoracostomy Tube of Shane Loveland (Demonstrative)		Demonstratives to be exchanged wk of 3/9/20			
17.		Surgical Procedure of Right Thoractomy with Repair of Right Hemidiaphragm of Shane Loveland (Demonstrative)		Demonstratives to be exchanged wk of 3/9/20			
18.		Interactive Exhibit of Shane Loveland (Demonstrative)		Demonstratives to be exchanged wk of 3/9/20			
19.		Rule 1006 Summary Itemization of Past Medical Bills for Shane Loveland		FRCP 26(a), (e); 37(b), (c). R. F. FRE 1006.			

20.		Medical Bills for Shane Loveland		FRCP 26(a), (e); 37(b), (c).			
21.		Report of Craig H. Lichtblau, M.D.		MIL (ECF No. 164). H. R. F.			
22.		CV, Fee Schedule & Deposition/Testimony Log of Craig H. Lichtblau, M.D.			X		
23.		Craig H. Lichtblau's Continuation of Care for Shane Loveland (Depo Exhibit H)		MIL (ECF No. 164). H. R. F.			
24.		Photos relied upon by Dr. Lichtblau			X		
25.		Craig Lichtblau's File Materials			X		
26.		Report of Bernard Pettingill, Jr., Ph.D. dated 03/13/19		H. R. F.			
27.		Report of Bernard Pettingill, Jr., Ph.D. Pettingill dated 11/19/19		H. R. F.			
28.		CV, Fee Schedule, Deposition/Testimony Log of Bernard Pettingill, Jr., Ph.D.			X		
29.		Basic Assumptions from Bernard Pettingill, Jr., Ph.D. for Shane Loveland		H. R. F.			
30.		Loss of Earnings Capacity from Bernard Pettingill, Jr., Ph.D. for Shane Loveland		H. R. F.			
31.		Quantitative Economic Loss Summary from Bernard Pettingill, Jr., Ph.D. for Shane Loveland		H. R. F.			
32.		Wage Loss Summary from Bernard Pettingill, Jr., Ph.D. for Shane Loveland		H. R. F.			
33.		Future Medical Categories from Bernard Pettingill, Jr., Ph.D. for Shane Loveland		H. R. F.			
34.		Life Table for White Males relied upon by Bernard Pettingill, Jr., Ph.D. for Shane Loveland			X		
35.		Minimum Wage Per Hour Table relied upon by Bernard Pettingill, Jr., Ph.D. for Shane Loveland			X		
36.		Inflation C.P.I. Table relied upon by Bernard Pettingill, Jr., Ph.D. for Shane Loveland			X		
37.		Medical Inflation Table relied upon by Bernard Pettingill, Jr., Ph.D. for Shane Loveland			X		

38.		Year to Year Changes in Medical Care Costs relied upon by Bernard Pettingill, Jr., Ph.D. for Shane Loveland		R. F.			
39.		Bernard Pettingill File Materials		H. R. F.			
40.		Injury Photos of Jacob Summers		FRCP 26(a), (e); 37(b), (c). FRE 403.			
41.		CD-ROM of Imaging Studies for Jacob Summers from New West Sports Medicine			X		
42.		CD-ROM of Imaging Studies for Jacob Summers from Good Samaritan Hospital			X		
43.		CD-ROM of Imaging Studies for Jacob Summers from Nebraska Medical Center		FRCP 26(a), (e); 37(b), (c).			
44.		CD-ROM of Imaging Studies for Jacob Summers from Advanced Medical Imaging		FRCP 26(a), (e); 37(b), (c).			
45.		CD-ROM of Imaging Studies for Jacob Summers from Family Practice Association		FRCP 26(a), (e); 37(b), (c).			
46.		CD-ROM of Imaging Studies for Jacob Summers from Kearney Regional Medical Center		FRCP 26(a), (e); 37(b), (c).			
47.		CD-ROM of Imaging Studies for Jacob Summers from Kearney Clinic		FRCP 26(a), (e); 37(b), (c).			
48.		Dandee Employment Records for Jacob Summers			X		
49.		Itemization of Past Wage loss for Jacob Summers		FRCP 26(a), (e); 37(b), (c). F.			
50.		Rule 1006 Summary Itemization of Medical Specials For Jacob Summers		FRCP 26(a), (e); 37(b), (c). F. FRE 1006.			
51.		Medical Bills for Jacob Summers		FRCP 26(a), (e); 37(b), (c).			
52.		Summary of Injuries for Jacob Summers (Demonstrative)		Demonstratives to be exchanged wk of 3/9			
53.		Surgical Procedure of Emergency Abdominal Surgery of 05/01/15 of Jacob Summers (Demonstrative)		Demonstratives to be exchanged wk of 3/9			
54.		Surgical Procedure of 05/04/15 Abdominal Surgery of Jacob Summers (Demonstrative)		Demonstratives to be exchanged wk of 3/9			
55.		Surgical Procedure of 05/08/15 Posterior Cervical Fusion at C4-7		Demonstratives to be			

		of Jacob Summers (Demonstrative)		exchanged wk of 3/9			
56.		Surgical Procedure of 12/13/16 C6-7 Anterior Cervical Discectomy and Fusion (Demonstrative)		Demonstrati ves to be exchanged wk of 3/9		WITH DRA W	
57.		Interactive Exhibit of Jacob Summers (Demonstrative)		Demonstrativ es to be exchanged wk of 3/9			
58.		CV of Chris Cornett, M.D.			X		
59.		CV of Paul J. Schenarts, M.D.			X		
60.		Subject Right Rear Tire Goodyear Wrangler HT LT235/85R16			X		
61.		Subject Right Rear Wheel			X		
62.		Companion Left Rear Goodyear Wrangler HT LT235/85R16			X		
63.		Companion Left Rear Wheel			X		
64.		Companion Right Front Tire Goodyear Wrangler HT LT235/85R16			X		
65.		Companion Right Front Wheel			X		
66.		Companion Left Front Tire Goodyear Wrangler HT LT235/85R16			X		
67.		Companion Left Front Wheel			X		
68.		David Southwell's Curriculum Vitae <i>Marked as Exhibit 7 to David Southwell's March 28, 2019 deposition.</i>			X		
69.		David Southwell's March 2019 Expert Report		MILs (ECF Nos. 161, 163, 165, 167, 170, 171, 172, 174, 176, 179). R. H. FRE 403, 407, 702.			
70.		David Southwell's Supplemental Expert Report after Receipt of Global Master Specification		MILs (ECF Nos. 163, 170, 179). R. H. FRE 403.			
71.		David Southwell's Subject Right Rear Tire Photographs			X		
72.		David Southwell's Companion Left Rear Tire Photographs			X		
73.		David Southwell's Companion Left Front Tire Photographs			X		

74.		David Southwell's Companion Right Front Tire Photographs			X		
75.		David Southwell's Subject Right Rear Tire X-rays		R. F. FRE 403.			
76.		David Southwell's Companion Left Rear Tire X-Rays		R. F. FRE 403.			
77.		David Southwell's Companion Left Front Tire X-Rays		R. F. FRE 403.			
78.		David Southwell's Companion Right Front Tire X-Rays		R. F. FRE 403.			
79.		David Southwell's Companion Left Rear Tire Shearography		R. F. FRE 403.			
80.		David Southwell's Companion Left Front Tire Shearography		R. F. FRE 403.			
81.		David Southwell's Companion Right Front Tire Shearography		R. F. FRE 403.			
82.		David Southwell's Reference Materials		R. F. FRE 403.			
83.		Micky Gilbert's Curriculum Vitae			X		
84.		Micky Gilbert's March 12, 2019 Expert Report <i>Marked as Exhibit 4 to Micky Gilbert's deposition taken on April 14, 2019.</i>		H.			
85.		Micky Gilbert's Scene Photographs			X		
86.		Micky Gilbert's Scene Drone Photographs			X		
87.		Micky Gilbert's Vehicle Photographs			X		
88.		Micky Gilbert's Tire and Wheel Photographs			X		
89.		Micky Gilbert's Accident Calculations <i>Marked as Exhibit 6 to Micky Gilbert's deposition taken on April 14, 2019.</i>			X		
90.		Micky Gilbert's Subject Vehicle Ghost Image			X		
91.		Micky Gilbert's Scene Diagram <i>Marked as Exhibit 5 to Micky Gilbert's deposition taken on April 14, 2019.</i>			X		
92.		Micky Gilbert's Scene Models 1-5			X		
93.		Micky Gilbert's Vehicle Models 1-2			X		
94.		Micky Gilbert's Reference Materials (Core Documents)		R. F.			

		<i>Marked as Exhibit 1 to Micky Gilbert's deposition taken on April 14, 2019.</i>					
95.		Bosch Crash Data Retrieval <i>Blair000219-224</i>			X		
96.		Gadsden Tire Specification <i>GY Susman 28939-28965</i>		MIL (ECF No. 170, 179).			
97.		Gadsden Tire Specification <i>GY Susman 28966-28971</i>		MIL (ECF No. 170, 179).			
98.		Gadsden Tire Specification <i>GY Susman 28972-29010</i>		MIL (ECF No. 170, 179).			
99.		Spec Change Authorization Sheet <i>GY Susman 28932-28938</i>		MIL (ECF No. 170, 179).			
100.		Mold Drawing <i>GY Susman 36466-36473</i>		MIL (ECF No. 170, 179).			
101.		GMS – Holographic Examination of RLT <i>GY Susman 36300-36314</i>		MIL (ECF No. 170, 179).			
102.		GMS – Tolerances & Limitations of RLT <i>GY Susman 36315-36334</i>		MIL (ECF No. 170, 179).			
103.		GMS – X-Ray Disposition RLT <i>GY Susman 36335-36363</i>		MIL (ECF No. 170, 179).			
104.		GMS – Cut Tire Programs <i>GY Susman 36364-36367</i>		MIL (ECF No. 170, 179).			
105.		GMS – Cut Tire Program <i>GY Susman 36368-36429</i>		MIL (ECF No. 170, 179).			
106.		GMS – Quality Assurance Programs <i>GY Susman 36430-36465</i>		MIL (ECF No. 170, 179).			
107.		GMS – Tolerances & Limitations RLT <i>GY Susman 36474-36492</i>		MIL (ECF No. 170, 179).			
108.		Goodyear/Kelly Load Range E Warranty <i>GY Susman 6187-6202</i>		MILs (ECF Nos. 165, 170, 171, 172, 174, 176, 179). R. FRE 403.			
109.		Universal Adjustment System Version 3.8 Adjustment data Subject Tire <i>GY Susman 20839-20844</i>		MILs (ECF No. 170, 176, 179). R. FRE 403.			
110.		Goodyear Wrangler HT Tire Information Page		R. F.			

		<i>Marked as Exhibit 502 to deposition of Jay Lawrence taken on November 15, 2019.</i>					
111.		Important Safety Program dated 02/12/02 <i>GY Susman 01385-01401</i> <i>Marked as Exhibit 503 to deposition of Jay Lawrence taken on November 15, 2019.</i>		MILs (ECF No. 161, 170, 171, 174, 179). R. FRE 403, 407.			
112.		Product Performance Review dated 09/17/97 <i>GY Susman 31805-31824</i> <i>Marked as Exhibit 504 to deposition of Jay Lawrence taken on November 15, 2019.</i> <i>Also, marked as Exhibit 29 to Joseph Zekoski's Deposition taken in Corwin.</i>		MILs (ECF Nos. 161, 165, 170, 172, 174, 176, 179). R. FRE 403.			
113.		North American Tire Crown Integrity Update dated 04/01/99 <i>GY Susman 24263-24279</i> <i>Marked as Exhibit 505 to deposition of Jay Lawrence taken on November 15, 2019.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.			
114.		Crown Area Improvements in LR E MPV Tires (An Overview of Kelly/Goodyear Work) dated 11/05/96 <i>GY Susman 26475-26482</i> <i>Marked as Exhibit 506 to deposition of Jay Lawrence taken on November 15, 2019.</i> <i>Also, marked as Exhibit 3 to Beale Robinson's Deposition taken in Frankl.</i> <i>Also, marked as Exhibit 27 to Richard Olsen's Deposition taken in Arredondo bates GY Susman 28228-28268.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.			
115.		ODI Resume dated 11/21/00 <i>GY Susman 01366-01368</i> <i>Marked as Exhibit 507 to deposition of Jay Lawrence taken on November 15, 2019.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 173, 174, 176, 179). R. FRE 403, 407.			
116.		Correspondence to Dennis O'Connor dated 12/01/00		MILs (ECF Nos. 165,			

		<p><i>GY Susman 26385-26391</i> <i>Marked as Exhibit 508 to deposition of Jay Lawrence taken on November 15, 2019.</i> <i>Also marked as Exhibit 17 to Chester Patterson's Deposition taken in Ebanks bates GY Susman 26385-26391.</i> <i>Also marked as Exhibit 25 to Ernest Kessell's Deposition taken in Garcia bates GY Susman 26208-26215.</i></p>		170, 172, 174, 179). R. FRE 403, 407.			
117.		<p>Trailer Tire Changeover Program dated 07/07/00 <i>GY Susman 28805-28807</i> <i>Marked as Exhibit 509 to deposition of Jay Lawrence taken on November 15, 2019 bates GY Susman 30629-30631</i> <i>Also, marked as Exhibit 1 to Dennis O'Connor's Deposition taken in Boerm.</i></p>		MILs (ECF Nos. 161, 165, 170, 172, 174, 179). R. FRE 403, 407.			
118.		<p>Tread/Top Belt 'Throws' dated 01/25/96 <i>GY Susman 21533-21562</i></p>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.			
119.		<p>Tread/Top Belt Throw dated 03/01/96 <i>GY Susman 22669-22682</i></p>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.			
120.		<p>RLT Damage Claims <i>GY Susman 22229</i></p>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.			
121.		<p>RLT Crown Integrity dated 05/13/96 <i>GY Susman 22763-22776</i> <i>Also, identified as 989 and 992 in Joseph Zekoski's Deposition taken in Ebanks.</i></p>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.			

		<i>Also, portions marked as Exhibit 33 to Daniel Hammontree's Deposition taken in Garcia bates GY Susman 25944-25949.</i>					
122.		Adjustments <i>GY Susman 27690-27691</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.			
123.		Damage Claim Summary Cumulative <i>GY Susman 27895</i> <i>Also, identified as 952 in Joseph Zekoski's Deposition taken in Ebanks.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. FRE 403, 407.			
124.		Chart of LRE claims from 1992-1998 <i>GY Susman 36695-36864</i>		MILs (ECF Nos. 161, 165, 170, 172, 179). R. FRE 403, 407.			
125.		Chart of LRE Claims <i>GY Susman 36865-37021</i>		MILs (ECF Nos. 161, 165, 170, 172, 179). R. FRE 403, 407.			
126.		NHTSA Reported Damage Claims <i>GY Susman 4250-4252</i>		MILs (ECF Nos. 161, 165, 170, 172, 174, 179). R. FRE 403, 407.			
127.		Status of 'Tread Throw' Analysis <i>GY Susman 20946-20952</i> <i>Also, marked as Exhibit 15 to Joseph Zekoski's Deposition taken in Corwin bates GY Susman 31641-31647.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.			
128.		RLT LR E Crown Integrity <i>GY Susman 22041-22151</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.			
129.		RLT Crown Durability Testing dated 06/03/96 <i>GY Susman 22259-22273</i>		MILs (ECF Nos. 161, 165, 170, 171, 172,			

		<i>Also, marked as Exhibit 9 to Joseph Zekoski's Deposition taken in Arredondo bates GY Susman 28169-28170.</i>		174, 176, 179). R. FRE 403, 407.			
130.		'Tread Throw' Team Kickoff Meeting dated 02/16/96 <i>GY Susman 22637-22653</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.			
131.		RLT Crown Separation by Tire Line <i>GY Susman 31348-31350</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.			
132.		Crown Area Improvements in LR E MPV Tires <i>GY Susman 31369-31376</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.			
133.		NHTSA Load Range E Issues <i>GY Susman 6216-6288</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.			
134.		Overlay Implementation Meeting <i>GY Susman 23115-23116</i> <i>Also, marked as Exhibit 232 to Ray Young's Deposition taken in Arredondo bates GY Susman 28474-28475.</i>		MILs (ECF Nos. 161, 170, 171, 174, 179). R. FRE 403, 407.			
135.		RLT Crown Integrity Test <i>GY Susman 23156-23158</i>		MILs (ECF Nos. 161, 170, 171, 174, 179). R. H. FRE 403, 407.			
136.		Isuzu NPR Truck <i>GY Susman 24624-24634</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. FRE 403, 407.			

137.		FEA of Crown vs Flat Built Nylon Spiral Overlay Tires <i>GY Susman 24918-24927</i>		MILs (ECF Nos. 161, 165, 170, 171, 174, 179). R. FRE 403, 407.			
138.		Email dated 11/11/98 <i>GY Susman 25494</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			
139.		LR E Tread Separation Review Meeting 8/23/00 <i>GY Susman 25685-25686</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. H. FRE 403, 407.			
140.		LR E Tread Separation Update <i>GY Susman 25687-25692</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.			
141.		Overlay FEA Analysis <i>GY Susman 27889</i>		MILs (ECF Nos. 161, 170, 171, 174, 179). R. FRE 403, 407.			
142.		RLT A-Team Meeting (#2. 2/20/96) dated 02/26/96 <i>GY Susman 20873-20876</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			
143.		RLT A-Team Meeting #3 (2/28/96) dated 02/29/96 <i>GY Susman 20877-20882</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			
144.		RLT A-Team Meeting #4 (3/6/96) dated 03/07/96 <i>GY Susman 20883-20888</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			

145.		RLT A-Team Meeting #5 (3/12/96) dated 03/14/96 <i>GY Susman 20889-20899</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			
146.		RLT A-Team Meeting #6 (3/22/96) dated 03/25/96 <i>GY Susman 22699-22705</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			
147.		RLT A-Team Meeting # 7 (3/27/96) dated 03/28/96 <i>GY Susman 20907-20915</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			
148.		RLT A-Team Meeting #9 (4/10/96) dated 04/10/96 <i>GY Susman 20923-20929</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			
149.		RLT A-Team Meeting #10 (4/17/96) dated 04/10/96 <i>GY Susman 21018-21023</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			
150.		RLT A-Team Meeting #11 (4/24/96) dated 04/25/96 <i>GY Susman 21024-21032</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			
151.		RLT A-Team Meeting # 13 (5/08/96) dated 05/09/96 <i>GY Susman 22755-22762</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			
152.		RLT A-Team Meeting # 14 (5/15/96) dated 05/15/96 <i>GY Susman 21051-21059</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			

153.		RLT Crown Integrity Team Meeting #16 (5/29/96) dated 05/29/96 <i>GY Susman 21069-21084</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			
154.		RLT Crown Integrity Team Meeting #17 (6/05/96) dated 06/05/96 <i>GY Susman 22809-22817</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			
155.		Crown Integrity Team Meeting #18 (6/12/96) dated 06/12/96 <i>GY Susman 21094-21096</i> <i>Also, marked as Exhibit 18 to Beale Robinson's Deposition taken in Frankl bates GY Susman 26708-26710.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			
156.		RLT Crown Integrity Team Meeting #19 (6/26/96) dated 06/27/96 <i>GY Susman 21097-21106</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			
157.		RLT Crown Integrity Team Meeting #21 (7/17/96) dated 07/18/96 <i>GY Susman 21117-21129</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			
158.		RLT Crown Integrity Team Meeting #22 (7/24/96) dated 07/24/96 <i>GY Susman 22870-22880</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			
159.		RLT Crown Integrity Team Meeting #23 (8/07/96) dated 08/08/96 <i>GY Susman 21141-21152</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			
160.		96242RDS 0484-RLT Crown Integrity Team dated 10/08/96 <i>GY Susman 22949</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. H. FRE 403, 407.			

161.		RLT Adjustment Data Need dated 07/02/96 <i>GY Susman 22950-22951</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. H. FRE 403, 407.			
162.		ODI Resume <i>GY Susman 00001</i> <i>Marked as Exhibit 15 to Chester Patterson's Deposition at GY Susman 26381.</i>		MILs (ECF Nos. 165, 170, 171, 172, 174, 179). R. FRE 403, 407.			
163.		Cover Letter responses to NHTSA's inquiries regarding NSA-12jfa PE00-046 <i>GY Susman 03702-03744</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. FRE 403, 407.			
164.		09.05.2001 letter to NHTSA <i>GY Susman 01126-01128</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. FRE 403, 407.			
165.		LA Times 'Goodyear Replaced Tires in 'Silent Recall,' Critics Allege		FRCP 26(a), (e); 37(b), (c). MILs (ECF Nos. 161, 165, 170, 171, 172, 173, 174, 175, 179). R. H. F. FRE 403, 407.			
166.		Letter to Kenneth Weinstein dated 01/28/02 <i>GY Susman 32013-32039</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			
167.		Summary of Crown Claims – 1996 Gadsden Production LT245/75R16 LR E Wrangler AT 11BT0 (740 353 439) <i>GY Susman 26432-26433</i> <i>Marked as Exhibit 1 to Beale Robinson's Deposition taken in Frankl.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.			

168.		<p>Crown Area Improvements in LR E MPV Tires (An Overview of Kelly/Goodyear Work) <i>GY Susman 26434-26474</i> <i>Marked as Exhibit 2 to Beale Robinson's Deposition taken in Frankl.</i> <i>Also, marked as Exhibit 14 to Joseph Zekoski's Deposition taken in Corwin bates GY Susman 31600-31640.</i> <i>Additional bates at GY Susman 31307-31347</i></p>		<p>MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.</p>			
169.		<p>RLT LR-E Crown Integrity Improvement 'ACT' Team <i>GY Susman 26483-26489</i> <i>Marked as Exhibit 4 to Beale Robinson's Deposition taken in Frankl.</i></p>		<p>MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.</p>			
170.		<p>Problem Summary <i>GY Susman 26490-26512</i> <i>Marked as Exhibit 5 to Beale Robinson's Deposition taken in Frankl.</i></p>		<p>MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.</p>			
171.		<p>Fayetteville/Gadsden Cure System Study June 9-13, 1997 <i>GY Susman 26513-26524</i> <i>Marked as Exhibit 6 to Beale Robinson's Deposition taken in Frankl.</i></p>		<p>MILs (ECF Nos. 161, 165, 168, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.</p>			
172.		<p>Product Performance <i>GY Susman 26525-26544</i> <i>Marked as Exhibit 7 to Beale Robinson's Deposition taken in Frankl.</i></p>		<p>MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.</p>			
173.		<p>RLT LR-E Crown Integrity Improvement Background/Overview <i>GY Susman 26545-26585</i> <i>Marked as Exhibit 8 to Beale Robinson's Deposition taken in Frankl.</i> <i>Also, marked as Exhibit 31 to Joseph Zekoski's Deposition taken</i></p>		<p>MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.</p>			

		<i>in Corwin bates GY Susman 31833-31873.</i>					
174.		<p>Crown Integrity Review December 4, 1997 <i>GY-Susman 21685-21709</i> <i>Marked as Exhibit 9 to Beale Robinson's Deposition taken in Frankl bates GY Susman 26586-26610.</i> <i>Also, marked as Exhibit 5 to Joseph Zekoski's Deposition taken in Arredondo bates GY Susman 28153-28165.</i> <i>Also, marked as Exhibit 18 to Joseph Zekoski's Deposition taken in Arredondo bates GY Susman 28184-28191.</i> <i>See also GY Susman 31519-31543.</i></p>		<p>MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.</p>			
175.		<p>RLT Crown Integrity Overview <i>GY Susman 26611-26630</i> <i>Marked as Exhibit 10 to Beale Robinson's Deposition taken in Frankl.</i></p>		<p>MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.</p>			
176.		<p>RLT LR-E Crown Integrity <i>GY Susman 26631-26654</i> <i>Marked as Exhibit 11 to Beale Robinson's Deposition taken in Frankl.</i> <i>Also, marked as Exhibit 13 to Daniel Hammontree, Beale Robinson and Dane Taylor's Depositions taken in Garcia bates GY Susman 25892-25915.</i> <i>Also, identified as 1408 and 1409 in Joseph Zekoski's Deposition taken in Ebanks.</i></p>		<p>MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.</p>			
177.		<p>North America Tire Crown Integrity Update April 1999 <i>GY Susman 26655-26672</i> <i>Marked as Exhibit 12 to Beale Robinson's Deposition taken in Frankl.</i></p>		<p>MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.</p>			
178.		<p>RLT Crown Integrity Team Meeting #15 <i>GY Susman 21060-21068</i></p>		<p>MILs (ECF Nos. 161, 165, 170, 171, 172,</p>			

		<i>Marked as Exhibit 13 to Beale Robinson's Deposition taken in Frankl bates GY Susman 26673-26681.</i>		174, 176, 179). R. FRE 403, 407.			
179.		Opportunities for Cured Tire Scrap Reduction <i>GY Susman 26682-26686</i> <i>Marked as Exhibit 14 to Beale Robinson's Deposition taken in Frankl.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 172, 174, 176, 179). R. H. FRE 403, 407.			
180.		RLT Tread Throw Team #2 Kickoff Meeting dated 02/19/96 <i>GY Susman 20869-20872</i> <i>Also, identified as 474 in Joseph Zekoski's Deposition taken in Ebanks.</i> <i>Marked as Exhibit 15 to Beale Robinson's Deposition taken in Frankl bates GY Susman 26687-26690.</i> <i>Also, marked as Exhibit 22 to Joseph Zekoski's Deposition taken in Corwin bates GY Susman 31727-31730.</i> <i>Also, marked as Exhibit 7 to Beale Robinson's Deposition taken in Ebanks bates GY Susman 26926.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. H. FRE 403, 407.			
181.		RLT A-Team Meeting #8 <i>GY Susman 20916-20922</i> <i>Marked as Exhibit 16 to Beale Robinson's Deposition taken in Frankl bates GY Susman 26691-26697.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. H. FRE 403, 407.			
182.		RLT A-Team Meeting #12 (5/01/96) dated 05/02/96) <i>GY Susman 21033-21042</i> <i>Marked as Exhibit 17 to Beale Robinson's Deposition taken in Frankl bates GY Susman 26698-26707.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. H. FRE 403, 407.			
183.		RLT Crown Integrity Team Meeting #20 <i>GY Susman 21107-21116</i> <i>Marked as Exhibit 19 to Beale Robinson's Deposition taken in</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. H. FRE 403, 407.			

		<i>Frankl bates GY Susman 26711-26720.</i>				
184.		RLT Crown Separation by Tire Line <i>GY Susman 26721-26723</i> <i>Marked as Exhibit 20 to Beale Robinson's Deposition taken in Frankl.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.		
185.		RLT Crown Integrity Meeting Team Meeting #24 <i>GY Susman 21153-21154</i> <i>Marked as Exhibit 21 to Beale Robinson's Deposition taken in Frankl bates GY Susman 26724-26725.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. H. FRE 403, 407.		
186.		Tire Cut Section Diagram <i>GY Susman 26726</i> <i>Marked as Exhibit 22 to Beale Robinson's Deposition taken in Frankl.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R.		
187.		RLT Crown Integrity Meeting Team Meeting #25 <i>GY Susman 21155-21157</i> <i>Marked as Exhibit 23 to Beale Robinson's Deposition taken in Frankl bates GY Susman 26727-26729.</i>		MILs (ECF Nos. 161, 165, 170, 171, 174, 179). R. FRE 403, 407.		
188.		RLT Crown Integrity Meeting Team Meeting #26 <i>GY-Susman 22937-22939</i> <i>Marked as Exhibit 24 to Beale Robinson's Deposition taken in Frankl bates GY Susman 26730-26732.</i> <i>Also, marked as Exhibit 17 to Daniel Hammontree, Beale Robinson and Dane Taylor's Depositions taken in Garcia bates GY Susman 25923-25928; GY Susman 26851-26856.</i> <i>Also, marked as Exhibit 3 to Joseph Zekoski's Deposition taken in Arredondo bates GY Susman 28153-28154.</i> <i>See also GY Susman 21158-21183</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. H. FRE 403, 407.		
189.		Radial Light Truck – Gadsden <i>GY Susman 26733</i>		MILs (ECF Nos. 161, 165, 168,		

		<i>Marked as Exhibit 25 to Beale Robinson's Deposition taken in Frankl.</i> <i>Also, portion marked as Exhibit 48 to Daniel Hammontree's Deposition taken in Garcia bates GY Susman 25961-25963.</i>		170, 171, 174, 179). R. H. FRE 403, 407.			
190.		RLT LR-E Crown Integrity GY-Susman 22525 <i>Marked as Exhibit 26 to Beale Robinson's Deposition taken in Frankl bates GY Susman 26734.</i> <i>Also, portion marked as Exhibit 48 to Daniel Hammontree's Deposition taken in Garcia bates GY Susman 25961-25963.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 174, 179). R. H. FRE 403, 407.			
191.		Cure Conditions at Gadsden GY-Susman 22579 <i>Marked as Exhibit 27 to Beale Robinson's Deposition taken in Frankl bates GY Susman 26735.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 174, 179). R. H. FRE 403, 407.			
192.		Gray Gadsden – Solid Fayetteville GY Susman 26736-26738 <i>Marked as Exhibit 28 to Beale Robinson's Deposition taken in Frankl.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 174, 179). R. FRE 403, 407.			
193.		Lubrication of Press Center Mechanism Lower Bladder Clamp Ring Hub Threads GY Susman 26739-26741 <i>Marked as Exhibit 29 to Beale Robinson's Deposition taken in Frankl.</i> <i>Also, marked as Exhibit 19 to Joseph Zekoski's Deposition taken in Arredondo bates GY Susman 28192-28195.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 174, 179). R. H. FRE 403, 407.			
194.		RLT LR-E Power Point Presentation GY Susman 26742 <i>Marked as Exhibit 30 to Beale Robinson's Deposition taken in Frankl.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 174, 179). R. H. FRE 403, 407.			
195.		RLT A Team Meeting #11 GY Susman 26743-26763.		MILs (ECF Nos. 161, 165, 170, 171, 172,			

		<i>Marked as Exhibit 31 to Beale Robinson's Deposition taken in Frankl. GY Susman 22736-22744</i>		174, 176, 179). R. H. FRE 403, 407.			
196.		United States Patent 5,000,239 <i>GY Susman 26764-26776 Marked as Exhibit 32 to Beale Robinson's Deposition taken in Frankl. Also, marked as Exhibit 49 to Beale Robinson's Depositions taken in Garcia bates GY Susman 26886-26898.</i>		MILs (ECF Nos. 170, 179). R.			
197.		RLT LR E Crown Integrity Improvement Team Trip; Fayetteville/Gadsden w/o 4/27/97 <i>GY-Susman 22535-22537 Marked as Exhibit 33 to Beale Robinson's Deposition taken in Frankl bates GY Susman 26777-26780. Also, portion marked as Exhibit 48 to Daniel Hammontree's Deposition taken in Garcia bates GY Susman 25961-25963. See also GY Susman 21438-21440</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. H. FRE 403, 407.			
198.		Wrangler Tread/Top Belt Throws <i>GY Susman 23634-23638 Marked as Exhibit 1 to Madelon Kominic's Deposition taken in Frankl bates GY Susman 26279-26280.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. H. FRE 403, 407.			
199.		RLT 235/85R16 Load Range E Tread Throw Investigations <i>GY-Susman 21214-21216 Marked as Exhibit 2 to Madelon Kominic's Deposition taken in Frankl bates GY Susman 26281-26314. Also, marked as Exhibit 15 to Daniel Hammontree, Beale Robinson and Dane Taylor's Depositions taken in Garcia bates GY Susman 25916-25917; GY Susman 26844-26845</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 174, 179). R. H. FRE 403, 407.			
200.		RLT 235/85R16 Load Range E Tread Throw Problem Investigations		MILs (ECF Nos. 161, 165, 168,			

		<i>GY-Susman 21226-21227 Marked as Exhibit 3 to Madelon Kominic's Deposition taken in Frankl bates GY Susman 26315-26316.</i>		170, 171, 174, 179). R. H. FRE 403, 407.			
201.		<i>Wrangler LT Tire Defects GY-Susman 21228-21229 Marked as Exhibit 5 to Madelon Kominic's Deposition taken in Frankl bates GY Susman 26319-26320. Also, marked as Exhibit 23 to Joseph Zekoski's Deposition taken in Corwin bates GY Susman 31731-31732.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 174, 179). R. H. FRE 403, 407.			
202.		<i>Holograph "A" Rates Tires GY-Susman 21430 Marked as Exhibit 6 to Madelon Kominic's Deposition taken in Frankl bates GY Susman 26321.</i>		MILs (ECF Nos. 161, 165, 170, 171, 174, 179). R. H. FRE 403, 407.			
203.		<i>RLT LR-E Plant Exchange and Mold Extraction Trials GY-Susman 23554-23556 Marked as Exhibit 7 to Madelon Kominic's Deposition taken in Frankl bates GY Susman 26322-26326.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 174, 179). R. H. FRE 403, 407.			
204.		<i>Wrangler AT Performance GY Susman 26327 Marked as Exhibit 1 to James Nespo's Deposition taken in Frankl.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 174, 179). R. H. FRE 403, 407.			
205.		<i>Letter to Major John Farner GY Susman 26328 Marked as Exhibit 2 to James Nespo's Deposition taken in Frankl.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 174, 179). R. H. FRE 403, 407.			
206.		<i>Wrangler AT Performance GY Susman 26329 Marked as Exhibit 3 to James Nespo's Deposition taken in Frankl.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			
207.		<i>Tire Information Request GY Susman 26330-26331</i>		MILs (ECF Nos. 161, 165, 168,			

		<i>Marked as Exhibit 4 to James Nespo's Deposition taken in Frankl.</i>		170, 171, 174, 179). R. H. FRE 403, 407.			
208.		Handwritten Note <i>GY Susman 26332</i> <i>Marked as Exhibit 5 to James Nespo's Deposition taken in Frankl.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 174, 179). R. H. F. FRE 403, 407.			
209.		Dismounted Returned Tire Inspection – Wrangler AT Tires <i>GY Susman 26333-26334</i> <i>Marked as Exhibit 6 to James Nespo's Deposition taken in Frankl.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			
210.		Analysis of RLT Load Range E Tires <i>GY-Susman 23409-23430</i> <i>Marked as Exhibit 1 to Edward Terrill's Deposition taken in Frankl bates GY Susman 26971-26997.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 174, 179). R. H. FRE 403, 407.			
211.		Tire Aging (Analysis of RLT Load Range E Tires) <i>GY-Susman 23377-23393</i> <i>Marked as Exhibit 2 to Edward Terrill's Deposition taken in Frankl bates GY Susman 26998-27014.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 174, 179). R. H. FRE 403, 407.			
212.		Lee Landrover LT235/85R16 E all cond <i>GY Susman 25964-25965</i> <i>Marked as Exhibit 5 to Daniel Hammontree's Deposition taken in Ebanks.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 172, 174, 179). R. FRE 403, 407.			
213.		The Goodyear Tire & Rubber Company Land Rover LT235/85R16, LR E Claims <i>GY Susman 25966</i> <i>Marked as Exhibit 6 to Daniel Hammontree's Deposition taken in Ebanks.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 172, 174, 179). R. FRE 403, 407.			
214.		Cut Back of a Tire <i>GY Susman 28013</i>		MILs (ECF Nos. 161, 165, 168, 170, 174, 179).			

		<i>Marked as Exhibit 1 to Joseph Zekoski's Deposition taken in Ebanks.</i>		R. F.			
215.		Tire Diagram <i>GY Susman 28014</i> <i>Marked as Exhibit 2 to Joseph Zekoski's Deposition taken in Ebanks.</i> <i>Also marked as Exhibit 2 to Richard Olsen's Deposition taken in Ebanks bates GY Susman 30701.</i>		MILs (ECF Nos. 161, 165, 168, 170, 174, 179). R. F.			
216.		Tread/Top Belt Throw dated 04/01/96 <i>GY Susman 21346-21398</i> <i>Referenced as Ebanks 954, 956, 965 and 966 in Joseph Zekoski's Deposition taken in Ebanks.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.			
217.		Development of Tread Durability Test <i>GY-Susman 22274-22276</i> <i>Marked as Exhibit 10 to Chester Patterson's Deposition taken in Ebanks GY Susman 26372-26374.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			
218.		ISUZU NPR, LT215/85R16 Tread Integrity Meeting <i>GY Susman 26375</i> <i>Marked as Exhibit 11 to Chester Patterson's Deposition taken in Ebanks.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 174, 179). R. H. FRE 403, 407.			
219.		Isuzu NPR Durability Testing Results <i>GY Susman 26376</i> <i>Marked as Exhibit 12 to Chester Patterson's Deposition taken in Ebanks.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 174, 179). R. FRE 403, 407.			
220.		Bent Axle Test for Crown Area Durability <i>GY Susman 26377</i> <i>Marked as Exhibit 13 to Chester Patterson's Deposition taken in Ebanks.</i>		MILs (ECF Nos. 161, 165, 170, 171, 174, 179). R. FRE 403, 407.			
221.		ISUZU NPR, LT 215/85R16 Durability Improvement <i>GY Susman 26378-26380</i>		MILs (ECF Nos. 161, 165, 170, 171, 174, 179). R. FRE 403, 407.			

		<i>Marked as Exhibit 14 to Chester Patterson's Deposition taken in Ebanks.</i> <i>Also, marked as Exhibit 4 to Joseph Zekoski's Deposition taken in Arredondo bates GY Susman 28155-28157.</i>					
222.		Letter to ODI dated 08/16/01 GY Susman 26382-26384 <i>Marked as Exhibit 16 to Chester Patterson's Deposition taken in Ebanks.</i> <i>Also marked as Exhibit 25 to Beale Robinson's Deposition taken in Ebanks bates GY Susman 26964-26966.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			
223.		Letter to Kenneth Weinstein dated 01/28/02 GY Susman 26395-26397 <i>Marked as Exhibit 19 to Chester Patterson's Deposition taken in Ebanks.</i> <i>Also, marked as Exhibit 24 to Beale Robinson's Deposition taken in Ebanks bates GY Susman 26961-26963.</i> <i>Also, marked as Exhibit 2 to Dennis O'Connor's Deposition taken in Boerm bates GY Susman 30632-30658.</i> <i>Additional bates at GY Susman 01375-01401.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			
224.		Meeting on LT-Metric 'Tread-Throw' Field Problems (9/19-21/95) GY-Susman 20930-20933 <i>Marked as Exhibit 1 to Beale Robinson's Deposition taken in Ebanks bates GY Susman 26899-26902.</i> <i>Also, marked as Exhibit 30 to Richard Olsen's Deposition taken in Arredondo bates GY Susman 28293-28296.</i> <i>Also, marked as Exhibit 12 to Joseph Zekoski's Deposition taken in Corwin bates GY Susman 31550-31553.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			

		<i>Also, identified as 535 in Joseph Zekoski's Deposition taken in Ebanks.</i>					
225.		LT-Metric Damage Claim Tire by Date of Production Load Range D & E <i>GY Susman 26903</i> <i>Marked as Exhibit 2 to Beale Robinson's Deposition taken in Ebanks.</i> <i>Also, marked as Exhibit 34 to Richard Olsen's Deposition taken in Arredondo bates GY Susman 28306.</i> <i>Also, identified as 573 in Joseph Zekoski's Deposition taken in Ebanks.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. FRE 403, 407.			
226.		Overview Conclusions <i>GY Susman 26904</i> <i>Marked as Exhibit 3 to Beale Robinson's Deposition taken in Ebanks.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 172, 174, 179). R. FRE 403, 407.			
227.		Root Cause Investigation #1 Tire Conditions Have Changed <i>GY Susman 26905</i> <i>Marked as Exhibit 4 to Beale Robinson's Deposition taken in Ebanks.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 174, 179). R. FRE 403, 407.			
228.		Building Specification <i>GY Susman 26906-26924</i> <i>Marked as Exhibit 5 to Beale Robinson's Deposition taken in Ebanks.</i>		MILs (ECF Nos. 161, 165, 168, 170, 179). R. FRE 403, 407.			
229.		Damage Claim Summary <i>GY-Susman 20851</i> <i>Marked as Exhibit 6 to Beale Robinson's Deposition taken in Ebanks bates GY Susman 26925.</i> <i>Also, identified as 456 in Joseph Zekoski's Deposition taken in Ebanks.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 172, 174, 179). R. FRE 403, 407.			
230.		Probable Root-Cause Weak Boundary Layer Between RLT Belts 1&2 <i>GY Susman 26927</i>		MILs (ECF Nos. 161, 165, 170, 171, 174, 179). R. FRE 403, 407.			

		<i>Marked as Exhibit 8 to Beale Robinson's Deposition taken in Ebanks.</i>					
231.		Damage Claims Tread Sep Damage Claims Trend for 1995 <i>GY Susman 26928</i> <i>Marked as Exhibit 9 to Beale Robinson's Deposition taken in Ebanks.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. FRE 403, 407.			
232.		RLT Crown Integrity <i>GY Susman 26929</i> <i>Marked as Exhibit 10 to Beale Robinson's Deposition taken in Ebanks.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. FRE 403, 407.			
233.		Settled Damage Claims by Year of Manufacture <i>GY Susman 26932</i> <i>Marked as Exhibit 11 to Beale Robinson's Deposition taken in Ebanks.</i> <i>Also, identified as 1182 in Joseph Zekoski's Deposition taken in Ebanks.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. FRE 403, 407.			
234.		Combined Goodyear/Kelly PL Claims Projection <i>GY Susman 26933</i> <i>Marked as Exhibit 12 to Beale Robinson's Deposition taken in Ebanks.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. FRE 403, 407.			
235.		Problem Summary <i>GY Susman 26934</i> <i>Marked as Exhibit 13 to Beale Robinson's Deposition taken in Ebanks.</i> <i>Also, identified as 1203 in Joseph Zekoski's Deposition taken in Ebanks.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.			
236.		Problem Summary <i>GY Susman 26935</i> <i>Marked as Exhibit 14 to Beale Robinson's Deposition taken in Ebanks.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.			
237.		Conclusions <i>GY Susman 26936</i>		MILs (ECF Nos. 161, 165, 170, 171, 172,			

		<i>Marked as Exhibit 15 to Beale Robinson's Deposition taken in Ebanks.</i>		174, 176, 179). R. F. FRE 403, 407.			
238.		Damage Claims Goodyear/Kelly Light Truck Tires <i>GY Susman 26937</i> <i>Marked as Exhibit 16 to Beale Robinson's Deposition taken in Ebanks.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. F. FRE 403, 407.			
239.		Combined Kelly/Goodyear Settled Damage Claims by Tire Size <i>GY Susman 26938</i> <i>Marked as Exhibit 17 to Beale Robinson's Deposition taken in Ebanks.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. F. FRE 403, 407.			
240.		Combined Goodyear/Kelly PL Claims Summary by Age of Tire <i>GY Susman 26939</i> <i>Marked as Exhibit 18 to Beale Robinson's Deposition taken in Ebanks.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. F. FRE 403, 407.			
241.		RLT LR-Overlay Implementation Planning <i>GY Susman 26940-26941</i> <i>Marked as Exhibit 19 to Beale Robinson's Deposition taken in Ebanks.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.			
242.		1996 Action Plan Effectiveness <i>GY Susman 26942</i> <i>Marked as Exhibit 20 to Beale Robinson's Deposition taken in Ebanks.</i>		MILs (ECF Nos. 161, 170, 171, 172, 174, 179). R. FRE 403, 407.			
243.		ISUZU NPR, LT 215/85R16 Durability Improvement <i>GY Susman 26943-26946</i> <i>Marked as Exhibit 21 to Beale Robinson's Deposition taken in Ebanks.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. H. FRE 403, 407.			
244.		ISUZU/Pre-Policy Report <i>GY Susman 26947</i> <i>Marked as Exhibit 22 to Beale Robinson's Deposition taken in Ebanks.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. H. FRE 403, 407.			

245.		United States Patent 4,815,511 <i>GY Susman 26948-26960</i> <i>Marked as Exhibit 23 to Beale Robinson's Deposition taken in Ebanks.</i>		MILs (ECF Nos. 161, 170, 171, 179). R.			
246.		Load Range E Truck Tires Alleged Tread/Belt Separations Accidents Involving Deaths or Injuries <i>GY Susman 26216-26218</i> <i>Marked as Exhibit 26 to Ernest Kessell's Deposition taken in Garcia.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. FRE 403.			
247.		Goodyear AT and ATS Warranty/Goodwill Adjustment Rates <i>GY Susman 26219-26222</i> <i>Marked as Exhibit 27 to Ernest Kessell's Deposition taken in Garcia.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. FRE 403.			
248.		Customer Contacts Wrangler AT and ATS LRE <i>GY Susman 26223</i> <i>Marked as Exhibit 28 to Ernest Kessell's Deposition taken in Garcia.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. H. FRE 403.			
249.		Master Product File Display <i>GY Susman 26270</i> <i>Marked as Exhibit 37 to Ernest Kessell's Deposition taken in Garcia.</i>		MILs (ECF Nos. 161, 170, 171, 174, 179). R.			
250.		Conclusions <i>GY Susman 25918-25922</i> <i>Marked as Exhibit 16 to Daniel Hammontree, Beale Robinson and Dane Taylor's Depositions taken in Garcia additional bates GY Susman 26846-26850.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 172, 174, 176, 179). R. F. FRE 403, 407.			
251.		Combined Goodyear/Kelly PL Claims Summary <i>GY Susman 25929-25933</i> <i>Marked as Exhibit 19 to Daniel Hammontree's Deposition taken in Garcia.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. F. FRE 403, 407.			
252.		1996 Tire Guide Load & Inflation Tables <i>GY Susman 25934-25935</i>		MILs (ECF Nos. 161, 165, 170, 171, 174, 176, 179).			

		<i>Marked as Exhibit 13 to Daniel Hammontree, Beale Robinson and Dane Taylor's Depositions taken in Garcia bates GY Susman 26866-26867.</i>		R. FRE 403.			
253.		RLT Size Breakout <i>GY Susman 25936-25938</i> <i>Marked as Exhibit 27 to Daniel Hammontree's Deposition taken in Garcia.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. F. FRE 403, 407.			
254.		Settled Damage Claims by Year of Manufacture <i>GY Susman 25939-25942</i> <i>Marked as Exhibit 28 to Daniel Hammontree's Deposition taken in Garcia.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.			
255.		Settled Damage Claims by Date of Claim <i>GY Susman 25943</i> <i>Marked as Exhibit 31 to Daniel Hammontree's Depositions taken in Garcia.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.			
256.		Kelly Exposure <i>GY Susman 25944-25949</i> <i>Marked as Exhibit 33 to Daniel Hammontree's Deposition taken in Garcia.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.			
257.		RLT Crown Integrity Improvement <i>GY Susman 25950-25954</i> <i>Marked as Exhibit 41 to Daniel Hammontree's Deposition taken in Garcia.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.			
258.		Conclusions/Recommendations <i>GY Susman 25955-25960</i> <i>Marked as Exhibit 46 to Daniel Hammontree's Deposition taken in Garcia.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.			
259.		Problem Summary <i>GY Susman 26838-26843</i>		MILs (ECF Nos. 161, 165, 170, 171, 172,			

		<i>Marked as Exhibit 14 to Beale Robinson's Deposition taken in Garcia.</i> <i>Also, marked as Exhibit 33 to Richard Olsen's Deposition taken in Arredondo bates GY Susman 28305.</i>		174, 176, 179). R. FRE 403, 407.			
260.		Probable Root-Cause: Weak Boundary Layer Between RLT Belts 1&2 <i>GY Susman 26857-26865</i> <i>Marked as Exhibit 21 to Beale Robinson's Deposition taken in Garcia.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.			
261.		RLT LR-E Crown Integrity Improvement 'ACT' Team <i>GY Susman 26868-26873</i> <i>Marked as Exhibit 34 to Beale Robinson's Deposition taken in Garcia.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 172, 174, 179). R. FRE 403, 407.			
262.		LR "E" Belt Wire <i>GY Susman 26874-26885</i> <i>Marked as Exhibit 38 to Beale Robinson's Deposition taken in Garcia.</i>		MILs (ECF Nos. 161, 165, 170, 171, 174, 179). R. FRE 403, 407.			
263.		Isuzu NPR Truck Tire LT215/85R16 Treadwear Report <i>GY-Susman 24843-24851</i> <i>Marked as Exhibit 207 to George Edward's Deposition taken in Arredondo GY Susman 28018-28026.</i> <i>Also, marked as Exhibit 207 to Mark Grund's Deposition taken in Arredondo bates GY Susman 28330-28338.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.			
264.		Isuzu NPR Tire Problems on Vehicle Durability Test <i>GY-Susman 24643-24645</i> <i>Marked as Exhibit 208 to George Edward's Deposition taken in Arredondo GY Susman 28027-28029.</i> <i>Also, marked as Exhibit 208 to Ray Young's Deposition taken in Arredondo GY Susman 28457-28459.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			

		<i>Also, marked as Exhibit 208 to Mark Grund's Deposition taken in Arredondo bates GY Susman 28339-28341.</i>					
265.		Isuzu Tread-Throw Tire GY-Susman 24641 <i>Marked as Exhibit 209 to Ray Young's Deposition taken in Arredondo GY Susman 28460.</i> <i>Also, marked as Exhibit 209 to Mark Grund's Deposition taken in Arredondo bates GY Susman 28342.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			
266.		Isuzu LT215/85R16 WHT Tread Separation Meeting Summary of Isuzu Dealer Conference in Phoenix on 1/19/95 GY-Susman 24651-24652 <i>Marked as Exhibit 210 to George Edward's Deposition taken in Arredondo GY Susman 28030-28033.</i> <i>Also, marked as Exhibit 210 to Ray Young's Deposition taken in Arredondo GY Susman 28461-28464.</i> <i>Also, marked as Exhibit 210 to Mark Grund's Deposition taken in Arredondo bates GY Susman 28343-28346.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			
267.		LT215/85R16 WHT Tread Throw GY Susman 28034-28035 <i>Marked as Exhibit 211 to George Edward's Deposition taken in Arredondo.</i> <i>Also, marked as Exhibit 211 to Ray Young's Deposition taken in Arredondo GY Susman 28465-28466.</i> <i>Also, marked as Exhibit 211 to Mark Grund's Deposition taken in Arredondo bates GY Susman 28347-28348.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			
268.		LT215/85R16 WHT for NPR GY-Susman 24638 <i>Marked as Exhibit 212 to George Edward's Deposition taken in Arredondo GY Susman 28036.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			

		<i>Also, marked as Exhibit 212 to Ray Young's Deposition taken in Arredondo GY Susman 28467. Also, marked as Exhibit 212 to Mark Grund's Deposition taken in Arredondo bates GY Susman 28349.</i>					
269.		<i>ISUZU NPR Truck – Burst Issue GY-Susman 24821 Marked as Exhibit 213 to George Edward's Deposition taken in Arredondo GY Susman 28037. Also, marked as Exhibit 213 to Ray Young's Deposition taken in Arredondo GY Susman 28468. Also, marked as Exhibit 213 to Mark Grund's Deposition taken in Arredondo bates GY Susman 28350.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			
270.		<i>Isuzu NPR – LT215/85R16 LR-E Wrangler HT GY Susman 28038 Marked as Exhibit 214 to George Edward's Deposition taken in Arredondo. Also, marked as Exhibit 214 to Mark Grund's Deposition taken in Arredondo bates GY Susman 28351.</i>		MILs (ECF Nos. 161, 165, 170, 171, 174, 179). R. FRE 403, 407.			
271.		<i>ISUZU NPR, LT 215/85R16 Tire Tread Separation Failures GY-Susman 24805-24806 Marked as Exhibit 215 to George Edward's Deposition taken in Arredondo bates GY Susman 28039. Also, marked as Exhibit 215 to Mark Grund's Deposition taken in Arredondo bates GY Susman 28352.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			
272.		<i>Isuzu NPR LT215/85R15 LR-E Tread Integrity GY-Susman 25001-25002 Marked as Exhibit 216 to George Edward's Deposition taken in Arredondo bates GY Susman 28040-28041. Also, marked as Exhibit 216 to Mark Grund's Deposition taken in</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			

		<i>Arredondo bates GY Susman 28353-28354.</i>					
273.		Isuzu NPR Truck, LT215/85R16 LR-E Wrangler HT <i>GY Susman 28042-28054</i> <i>Marked as Exhibit 217 to George Edward's Deposition taken in Arredondo.</i> <i>Also, marked as Exhibit 217 to Mark Grund's Deposition taken in Arredondo bates GY Susman 28355-28367.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			
274.		ISUZU NPR, LT215/85R16 Durability Improvement <i>GY Susman 28055-28058</i> <i>Marked as Exhibit 218 to George Edward's Deposition taken in Arredondo.</i> <i>Also, marked as Exhibit 218 to Iwao Uenoyama's Deposition in Arredondo bates GY Susman 28427-28430.</i> <i>Also, marked as Exhibit 218 to Ray Young's Deposition taken in Arredondo GY Susman 28469-28472.</i> <i>Also, marked as Exhibit 218 to Mark Grund's Deposition taken in Arredondo bates GY Susman 28368-28371.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			
275.		Isuzu NPR – LT215/85R16 WHT LR-E <i>GY Susman 28059</i> <i>Marked as Exhibit 219 to George Edward's Deposition taken in Arredondo.</i> <i>Also, marked as Exhibit 219 to Ray Young's Deposition taken in Arredondo GY Susman 28473.</i> <i>Also, marked as Exhibit 219 to Mark Grund's Deposition taken in Arredondo bates GY Susman 28372.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			
276.		Trip Report – Weight Study – Monarch/Odwalla <i>GY-Susman 24538-24560</i> <i>Marked as Exhibit 220 to George Edward's Deposition taken in</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			

		<p><i>Arredondo bates GY Susman 28060-28082.</i></p> <p><i>Also, marked as Exhibit 220 to Mark Grund's Deposition taken in Arredondo bates GY Susman 28373-28395.</i></p> <p><i>Also, marked as Exhibit 29 to Richard Olsen's Deposition taken in Arredondo bates GY Susman 28270-28292.</i></p> <p><i>Also, marked as Exhibit 220 to Richard Olsen's Deposition taken in Arredondo bates GY Susman 28434-28456.</i></p>				
277.		<p>ISUZU NPR LT215/85R16 WHT Meeting at American Isuzu GY Susman 28083-28085</p> <p><i>Marked as Exhibit 221 to George Edward's Deposition taken in Arredondo.</i></p> <p><i>Also, marked as Exhibit 221 to Iwao Uenoyama's Deposition in Arredondo bates GY Susman 28431-28433.</i></p> <p><i>Also, marked as Exhibit 221 to Mark Grund's Deposition taken in Arredondo bates GY Susman 28396-28398.</i></p>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174). R. H. FRE 403, 407.		
278.		<p>Isuzu NPR Truck GY Susman 28086-28113</p> <p><i>Marked as Exhibit 222 to George Edward's Deposition taken in Arredondo.</i></p> <p><i>Also, marked as Exhibit 222 to Mark Grund's Deposition taken in Arredondo bates GY Susman 28399.</i></p>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174). R. FRE 403, 407.		
279.		<p>LR-E Overlay Implementation Meeting, 2/19/99</p> <p>GY-Susman 25573-25576</p> <p><i>Marked as Exhibit 233 to Ray Young's Deposition taken in Arredondo bates GY Susman 28476-28479.</i></p>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174). R. H. FRE 403, 407.		
280.		<p>LR-E Overlay Implementation Meeting, 5/7/99</p> <p>GY-Susman 25557-25558</p> <p><i>Marked as Exhibit 237 to Ray Young's Deposition taken in</i></p>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174).		

		<i>Arredondo bates GY Susman</i> <i>28480-28481.</i>		R. H. FRE 403, 407.			
281.		Returned Tire Inspection <i>GY-Susman 20855</i> <i>Marked as Exhibit 28 to Richard Olsen's Deposition taken in Arredondo bates GY Susman 28269.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 172, 174, 179). R. FRE 403, 407.			
282.		Status of 'Tread-Throw' Analysis dated 10/09/95 <i>GY-Susman 20934-20937</i> <i>Marked as Exhibit 31 to Richard Olsen's Deposition taken in Arredondo bates GY Susman 28297-28300.</i> <i>Also, marked as Exhibit 32 to Richard Olsen's Deposition taken in Arredondo bates GY Susman 28301-28304.</i> <i>Also, marked as Exhibit 18 to Joseph Zekoski's Deposition taken in Corwin bates GY Susman 31680-31691.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			
283.		Failure Analysis <i>GY-Susman 28225</i> <i>Marked as Exhibit 35 to Richard Olsen's Deposition taken in Arredondo bates GY Susman 28307.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. FRE 403, 407.			
284.		LT-Metric Problem Summary <i>GY-Susman 28216</i> <i>Marked as Exhibit 36 to Richard Olsen's Deposition taken in Arredondo bates GY Susman 28308.</i> <i>Also, identified as 568 in Joseph Zekoski's Deposition taken in Ebanks.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. FRE 403, 407.			
285.		LT Recommendations <i>GY Susman 28309</i> <i>Marked as Exhibit 37 to Richard Olsen's Deposition taken in Arredondo.</i> <i>Also, identified as 597 in Joseph Zekoski's Deposition taken in Ebanks.</i>		MILs (ECF Nos. 161, 165, 170, 171, 174, 179). R. FRE 403, 407.			
286.		LT Phased Production Changes Phase I – Immediate		MILs (ECF Nos. 161, 165, 168,			

		<i>GY Susman 28310</i> <i>Marked as Exhibit 38 to Richard Olsen's Deposition taken in Arredondo.</i> <i>Also, identified as 598 in Joseph Zekoski's Deposition taken in Ebanks.</i>		170, 171, 174, 179). R. FRE 403, 407.			
287.		Problem Summary <i>GY-Susman 23614</i> <i>Marked as Exhibit 39 to Richard Olsen's Deposition taken in Arredondo GY Susman 28311.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			
288.		Damage Claims <i>GY Susman 28312</i> <i>Marked as Exhibit 40 to Richard Olsen's Deposition taken in Arredondo.</i> <i>Also, marked as Exhibit 1 to Joseph Zekoski's Deposition taken in Arredondo bates GY Susman 28166.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. FRE 403, 407.			
289.		Damage Claims Goodyear/Kelly Light Truck Tires <i>GY Susman 28313</i> <i>Marked as Exhibit 41 to Richard Olsen's Deposition taken in Arredondo.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. F. FRE 403, 407.			
290.		RLT Crown Integrity Team Action Items <i>GY Susman 28314-28316</i> <i>Marked as Exhibit 42 to Beale Robinson's Deposition taken in Arredondo.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 172, 174, 179). R. FRE 403, 407.			
291.		KS Fayetteville Tire Specification <i>GY Susman 28317-28319</i> <i>Marked as Exhibit 43 to Beale Robinson's Deposition taken in Arredondo.</i>		MILs (ECF Nos. 161, 165, 170, 171, 174, 179). R. FRE 403, 407.			
292.		KS Fayetteville Tire Specification <i>GY Susman 28320-28324</i> <i>Marked as Exhibit 44 to Beale Robinson's Deposition taken in Arredondo.</i>		MILs (ECF Nos. 161, 165, 170, 171, 174, 179). R. FRE 403, 407.			
293.		RLT Adjusted/Returned 'CA' Tires <i>GY Susman 28325</i>		MILs (ECF Nos. 161, 165, 170,			

		<i>Marked as Exhibit 45 to Beale Robinson's Deposition taken in Arredondo.</i>		171, 172, 174, 179). R. FRE 403, 407.			
294.		Gadsden Tire Specification GY Susman 28326-28328 <i>Marked as Exhibit 46 to Beale Robinson's Deposition taken in Arredondo.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 174, 179). R. FRE 403, 407.			
295.		Failure Mode GY-Susman 21475 <i>Marked as Exhibit 1 to Joseph Zekoski's Deposition taken in Arredondo bates GY Susman 28114.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. FRE 403, 407.			
296.		Kelly Springfield Tire Conditions GY Susman 28115-28121 <i>Marked as Exhibit 2 to Joseph Zekoski's Deposition taken in Arredondo.</i>		MILs (ECF Nos. 161, 165, 171, 172, 174). R. F.			
297.		Damage Claims Goodyear/Kelly by Date of Claim GY Susman 28167 <i>Marked as Exhibit 7 to Joseph Zekoski's Deposition taken in Arredondo.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. FRE 403, 407.			
298.		Adjustable Tire Condition GY Susman 28122-28152 <i>Marked as Exhibit 8 to Joseph Zekoski's Deposition taken in Arredondo.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172). R. F. FRE 403, 407.			
299.		Confirmation of Change in Specification GY Susman 28171 <i>Marked as Exhibit 10 to Joseph Zekoski's Deposition taken in Arredondo.</i>		MILs (ECF Nos. 161, 165, 170, 171, 179). R. FRE 403, 407.			
300.		Radial Light Truck GY Susman 28172-28175 <i>Marked as Exhibit 11 to Joseph Zekoski's Deposition taken in Arredondo.</i>		MILs (ECF Nos. 161, 165, 170, 171, 174, 179). R. FRE 403, 407.			
301.		Root Cause Investigation #2 Wire Treatment Differences GY Susman 28176 <i>Marked as Exhibit 12 to Joseph Zekoski's Deposition taken in Arredondo.</i>		MILs (ECF Nos. 161, 170, 171, 174, 179). R. FRE 403, 407.			

302.		Confirmation of Change in Specifications <i>GY Susman 28177</i> <i>Marked as Exhibit 13 to Joseph Zekoski's Deposition taken in Arredondo.</i>		MILs (ECF Nos. 161, 165, 170, 171, 174, 179). R. FRE 403, 407.			
303.		Gadsden Tire Specification <i>GY Susman 28178-28180</i> <i>Marked as Exhibit 14 to Joseph Zekoski's Deposition taken in Arredondo.</i>		MILs (ECF Nos. 161, 165, 170, 171, 174, 179). R. FRE 403, 407.			
304.		Ford Draws on Goodyear to Help Avert Concerns on Tire-Pressure Information <i>GY Susman 28182</i> <i>Marked as Exhibit 16 to Joseph Zekoski's Deposition taken in Arredondo.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 175, 179). R. FRE 403, 407.			
305.		Tires Converted to Overlay <i>GY Susman 28183</i> <i>Marked as Exhibit 17 to Joseph Zekoski's Deposition taken in Arredondo.</i>		MILs (ECF Nos. 161, 165, 170, 171, 174, 179). R. FRE 403, 407.			
306.		Tread Separation on Wrangler AT Tires <i>GY-Susman 24322</i> <i>Marked as Exhibit 20 to Joseph Zekoski's Deposition taken in Arredondo bates GY Susman 28196.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			
307.		RLT Belt Design Standards <i>GY Susman 28197</i> <i>Marked as Exhibit 21 to Joseph Zekoski's Deposition taken in Arredondo.</i>		MILs (ECF Nos. 161, 165, 170, 171, 174, 179). R. FRE 403, 407.			
308.		Preliminary Impact Assessment – Phase I <i>GY Susman 28198-28201</i> <i>Marked as Exhibit 22 to Joseph Zekoski's Deposition taken in Arredondo.</i>		MILs (ECF Nos. 161, 165, 170, 171, 174, 179). R. FRE 403, 407.			
309.		RLT LR-E Overlay Applications Tire Cost Analysis <i>GY Susman 28202-28204</i>		MILs (ECF Nos. 161, 165, 170, 171, 174, 179).			

		<i>Marked as Exhibit 23 to Joseph Zekoski's Deposition taken in Arredondo.</i>		R. FRE 403, 407.			
310.		Kickoff Meeting, 2/16/96 <i>GY Susman 28205</i> <i>Marked as Exhibit 24 to Joseph Zekoski's Deposition taken in Arredondo.</i>		MILs (ECF Nos. 161, 165, 170, 171, 174, 179). R. H. FRE 403, 407.			
311.		<i>Tread/Top Belt 'Throws' dated 11/10/1995</i> <i>GY Susman 28207-28227</i> <i>Marked as Exhibit 25B to Joseph Zekoski's Deposition taken in Arredondo.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.			
312.		Minutes of 11/10/95 Management Meeting – Tread/Top Belt Throws +REVISION+ DATED 11/14/95 with attachment <i>GY Susman 20953-20998</i>		MILs (ECF Nos. 161, 165, 170, 171, 174, 179). R. H. FRE 403, 407.			
313.		Goodyear Tire Manufacturing Process <i>GY Susman 30445</i> <i>Marked as Exhibit 2 to Richard Olsen's Deposition taken in Hebert.</i>		R. F.			
314.		Test Driver's Death Questioned as Goodyear Inquiry Nears End <i>GY Susman 30446-30447</i> <i>Marked as Exhibit 3 to Richard Olsen's Deposition taken in Hebert.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. F. H. FRE 403, 407.			
315.		Adjustment Procedure Manual <i>GY Susman 30114-30170</i> <i>Marked as Exhibit 4 to Richard Olsen's Deposition taken in Hebert.</i>		MIL (ECF Nos. 176). R. F.			
316.		<i>Tread/Top Belt 'Throws' dated 11/10/95</i> <i>GY Susman 29968-30018</i> <i>Marked as Exhibit 5 to Richard Olsen's Deposition taken in Hebert.</i>		MILs (ECF Nos. 161, 165, 170, 171, 174, 176, 179). R. FRE 403, 407.			
317.		Handwritten notes <i>GY Susman 31544-31545</i>		MILs (ECF Nos. 161, 165, 170, 171, 174, 179).			

		<i>Marked as Exhibit 1 to Joseph Zekoski's Deposition taken in Corwin.</i>		R. F. FRE 403, 407.			
318.		Fourth Amended Class Action Complaint for Damages <i>GY Susman 31694-31716</i> <i>Marked as Exhibit 2 to Joseph Zekoski's Deposition taken in Corwin.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. H. FRE 403, 407.			
319.		Expert Report of R.J. Grogan <i>GY Susman 31717-31726</i> <i>Marked as Exhibit 3 to Joseph Zekoski's Deposition taken in Corwin.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. H. F. FRE 403, 407.			
320.		Goodyear Replacing Truck Tires; Akron Firm Maintains Model Probed for Tears in Tread Not Defective <i>GY Susman 31546-31547</i> <i>Marked as Exhibit 10 to Joseph Zekoski's Deposition taken in Corwin.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 173, 174, 179). R. H. F. FRE 403, 407.			
321.		Goodyear Facing Government Safety Investigation Involving 27 Million Tires <i>GY Susman 31548-31549</i> <i>Marked as Exhibit 11 to Joseph Zekoski's Deposition taken in Corwin.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 173, 174, 179). R. H. F. FRE 403, 407.			
322.		Current RLT Gauges <i>GY Susman 31554-31599</i> <i>Marked as Exhibit 13 to Joseph Zekoski's Deposition taken in Corwin.</i>		MILs (ECF Nos. 161, 165, 170, 171, 174, 179). R. FRE 403, 407.			
323.		Tread/Top Belt 'Throws' dated 10/25/95 <i>GY-Susman 21473-21482</i> <i>Marked as Exhibit 16 to Joseph Zekoski's Deposition taken in Corwin bates GY Susman 31648-31657.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 174, 176, 179). R. FRE 403, 407.			
324.		Minutes of 1/25/96 Management Meeting Tread/Top Belt Throws <i>GY Susman 31658-31679</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 172, 174, 176, 179).			

		<i>Marked as Exhibit 17 to Joseph Zekoski's Deposition taken in Corwin.</i>		R. H. FRE 403, 407.			
325.		Tread/Top Belt Throw <i>GY Susman 31692-31693</i> <i>Marked as Exhibit 19 to Joseph Zekoski's Deposition taken in Corwin.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 172, 174, 179). R. FRE 403, 407.			
326.		RLT Crown Integrity <i>GY Susman 31733-31746</i> <i>Marked as Exhibit 24 to Joseph Zekoski's Deposition taken in Corwin.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.			
327.		RLT LR-E Crown Integrity Improvement 'ACT' Team <i>GY Susman 31747-31762</i> <i>Marked as Exhibit 25 to Joseph Zekoski's Deposition taken in Corwin.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.			
328.		RLT LR-E Crown Integrity Improvement 'ACT' Team <i>GY Susman 31763-31765</i> <i>Marked as Exhibit 26 to Joseph Zekoski's Deposition taken in Corwin.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 174, 179). R. H. FRE 403, 407.			
329.		LR-E Testing <i>GY Susman 31766-31796</i> <i>Marked as Exhibit 27 to Joseph Zekoski's Deposition taken in Corwin.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 172, 174, 176, 179). R. FRE 403, 407.			
330.		Load Range E Durability/Crown Study <i>GY-Susman 24059-24066</i> <i>Marked as Exhibit 28 to Joseph Zekoski's Deposition taken in Corwin bates GY Susman 31797-31804.</i>		MILs (ECF Nos. 161, 165, 170, 171, 174, 179). R. FRE 403, 407.			
331.		Total RLT Capacity vs. Requirement <i>GY Susman 31825-31832</i> <i>Marked as Exhibit 30 to Joseph Zekoski's Deposition taken in Corwin.</i>		MILs (ECF Nos. 161, 165, 168, 170, 171, 172, 174, 176, 179).			

				R. FRE 403, 407.			
332.		Isuzu – LT215/85R16 WHT Tread Throw Issue Information <i>GY-Susman 24606-24611</i> <i>Marked as Exhibit 32 to Joseph Zekoski's Deposition taken in Corwin bates GY Susman 31874-31879.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 179). R. FRE 403, 407.			
333.		Isuzu NPR Tread Separation F.T.A <i>GY Susman 31880</i> <i>Marked as Exhibit 33 to Joseph Zekoski's Deposition taken in Corwin.</i>		MILs (ECF Nos. 161, 165, 170, 171, 174, 179). R. FRE 403, 407.			
334.		Load Range E Overlay Conversion Plant <i>GY Susman 31881-31882</i> <i>Marked as Exhibit 34 to Joseph Zekoski's Deposition taken in Corwin.</i>		MILs (ECF Nos. 161, 165, 170, 171, 174, 179). R. FRE 403, 407.			
335.		RLT Load Range E Overlay Conversion Summary <i>GY Susman 31883-31884</i> <i>Marked as Exhibit 35 to Joseph Zekoski's Deposition taken in Corwin.</i>		MILs (ECF Nos. 161, 165, 170, 171, 174, 179). R. FRE 403, 407.			
336.		Excerpt from August 24, 1998 Prepolicy Report Summary <i>GY-Susman 23477</i> <i>Marked as Exhibit 36 to Joseph Zekoski's Deposition taken in Corwin bates GY Susman 31885.</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 173, 174, 179). R. H. F. FRE 403, 407.			
337.		Robert T. Jenkins' Letter to Editor and Goodyear <i>GY Susman 31886-31887</i> <i>Marked as Exhibit 37 to Joseph Zekoski's Deposition taken in Corwin.</i>		MILs (ECF Nos. 161, 165, 171, 172, 173, 174). R. H. F. FRE 403, 407.			
338.		Tire Service Life for Passenger Car and Light Truck Tires <i>GY-Susman 20832-20833</i> <i>Marked as Exhibit 2 to Eric Mizner Deposition taken in Ochoa-Garcia bates GY Susman 30671-30672.</i>		MILs (ECF No. 165). R. FRE 403.			

339.		Oxygen Content as a Function of Age (at the belt edge) <i>GY Susman 30676</i> <i>Marked as Exhibit 4 to Eric Mizner Deposition taken in Ochoa-Garcia.</i>		MILs (ECF Nos. 161, 170, 171, 172, 174, 179). R. FRE 403, 407.			
340.		Goodyear's submission to NHTSA regarding PE00-046 <i>GY Susman 00001-006325; 20845-25871</i>		MILs (ECF Nos. 161, 165, 170, 171, 172, 174, 176, 179). R. H. FRE 403, 407.			
341.		Goodyear LT235/85R16 Claims Files		MILs (ECF Nos. 170, 172, 174, 179). R. H. FRE 403.			
342.		Rule 1006 Summary of Goodyear LT235/85R16 Claims Files		MILs (ECF Nos. 170, 172, 174, 179). R. H. F. FRE 403.			
343.		Kearney Towing & Repair Center Invoice dated 06/10/2014 <i>GY-DCC 0104</i>			X		
344.		Farm Bureau Property & Casualty Estimate <i>Dandee00041</i>			X		
345.		Goodyear Statement on NHTSA Preliminary Investigation <i>GY Susman 34075-34077</i>		MILs (ECF Nos. 161, 170, 171, 174, 179). R. H. FRE 403.			
346.		Conclusions <i>GY Susman 27884</i> <i>Marked as Exhibit 146 to Ray Young's Deposition taken in Arredondo.</i>		MILs (ECF Nos. 161, 170, 171, 174, 179). R. FRE 403.			
347.		RLT LR-E Tread Throw Investigations <i>GY-Susman 21212-21213</i>					
348.		Goodyear Responds to Set Record Straight on Misleading Reports <i>GY-Susman 34078-34079</i>					
349.		Goodyear Tire Recall NHTSA Campaign Number 20T-002					
350.		Goodyear LT235/85R16 Liability Files					

351.	Rule 1006 Summary of Goodyear LT235/85R16 Liability Files					
352.	Craig Lichtblau's Rehabilitation Reevaluation Report					
353.	Craig Lichtblau's Continuation Care					
354.	Craig Lichtblau's Documentation of Prices					
355.	David Southwell's Supplemental Report dated March 2020 with Exhibits					
356.	Anatomical Model of the Brain and Skull (Demonstrative)					
357.	Tire Component Animation (Demonstrative)					
358.	Tire Replacement Animation (Demonstrative)					
359.	Lichtblau's Updated Photos					
360.	Bernard Pettingill's Second Amended Report					
361.	Surgical Procedure of 05/02/15 Abdominal Surgery of Jacob Summers (Demonstrative)					

The Goodyear Tire & Rubber Company reserves the right to object to exhibits not yet disclosed by Plaintiffs, including and not limited to, Exhibit Numbers 47-52, 415, 416. Goodyear also reserves the right to object to exhibits under Fed. R. Evid. 402 and 403.

KASTER, LYNCH, FARRAR & BALL, L.L.P.

Dated: March 11, 2020

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